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Attorneys for Defendant,
GARRISON PROPERTY AND CASUALTY
INSURANCE COMPANY

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

EDWARD WHEELER,

Plaintiffs,

vs.

GARRISON PROPERTY AND CASUALTY
INSURANCE COMPANY, and DOES 1 to 25,
inclusive,

Defendants.

CASE NO. 2:23-cv-00623-TLN-AC

**JOINT STIPULATION AND ORDER TO
MODIFY INITIAL PRETRIAL
SCHEDULING ORDER**

Plaintiff Edward Wheeler (“Wheeler”) and Defendant Garrison Property and Casualty
Insurance Company (“Garrison”) hereby agree and stipulate as follows:

STIPULATION

WHEREAS, the Court’s Initial Pretrial Scheduling Order dated September April 3, 2023
(Dkt. 3) set the following pertinent case management deadlines:

1. Fact Discovery Cutoff: December 6, 2023
2. Expert Disclosures: February 2, 2024
3. Rebuttal Expert Disclosures: March 1, 2024

1 4. Supplemental Discovery Cutoff: May 3, 2024

2 5. Dispositive Motion Deadline: June 3, 2024

3 WHEREAS, the parties are diligently engaged in the preparation of their Federal Rule of
4 Civil Procedure 26 initial disclosures for production on June 30, 2023, after which they will be in a
5 position to engage in further extensive written discovery, receive document production from
6 subpoenas served on non-party entities as necessary, and depositions;

7 WHEREAS, the parties previously agreed upon and set forth a modified case management
8 schedule within their Joint Status Report as filed on June 5, 2023 (Dkt. 7);

9 WHEREAS, following further discovery, including depositions, the parties will be in a
10 position to engage in settlement discussions, and are hopeful the matter will resolve;

11 WHEREAS, the parties agree there is a greater likelihood settlement will be reached in this
12 matter with additional time, and with the avoidance of expending fees on retaining expert
13 witnesses;

14 WHEREAS, the parties believe that a brief continuance of the case management deadlines,
15 as previously set forth within the Joint Status Report, is warranted to allow for further settlement
16 negotiations and resolution of the matter;

17 WHEREAS, the parties have not previously sought any time modifications in this case;

18 WHEREAS, the parties agree they will not be prejudiced by the continuance of the
19 discovery deadlines in this case;

20 WHEREAS, based upon the foregoing the parties believe good cause exists for the
21 modification of the Court's Initial Pretrial Scheduling Order;

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1 THEREFORE. IT IS HEREBY STIPULATED THAT the parties, by and through their
2 counsel, jointly and respectfully request that the Court modify the case management deadlines in
3 this case as follows:

- 4 1. Fact Discovery Cutoff: March 5, 2024
- 5 2. Expert Disclosures: May 3, 2024
- 6 3. Rebuttal Expert Disclosures: May 31, 2024
- 7 4. Supplemental Discovery Cutoff: July 31, 2024
- 8 5. Dispositive Motion Deadline: August 30, 2024

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10 SO STIPULATED.

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12 Dated: June 14, 2023

DKM LAW GROUP, LLP

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14 By: /s/Joshua N. Kastan

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GARRISON PROPERTY AND CASUALTY

INSURANCE COMPANY

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20 Dated: June 14, 2023

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21
22 By: /s/Matthew Richard*

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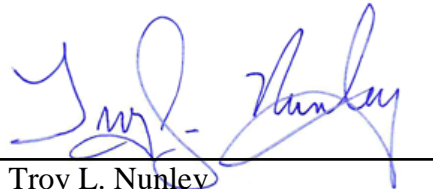
**Signed with permission*

ORDER

Pursuant to the parties' stipulation and good cause appearing, it is hereby ORDERED that the Pretrial Scheduling Order as set on April 3, 2023 (Dkt. 3) is hereby modified as follows:

1. Fact Discovery Cutoff: March 5, 2024
2. Expert Disclosures: May 3, 2024
3. Rebuttal Expert Disclosures: May 31, 2024
4. Supplemental Discovery Cutoff: July 31, 2024
5. Dispositive Motion Deadline: August 30, 2024

ORDERED and dated this 14th day of June, 2023.


Troy L. Nunley
United States District Judge